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BEFORE THE  
PUBLIC UTILITY COMMISSION  
FILING CLERK

JOINT APPLICATION OF ONCOR §  
ELECTRIC DELIVERY COMPANY §  
LLC AND AEP TEXAS INC. TO AMEND §  
CERTIFICATES OF CONVENIENCE §  
AND NECESSITY FOR A DOUBLE §  
CIRCUIT 345-KV TRANSMISSION §  
LINE IN PECOS, REEVES, AND WARD §  
COUNTIES (SAND LAKE – SOLSTICE §  
CCN) §

PUBLIC UTILITY COMMISSION  
OF TEXAS

**LCRA TRANSMISSION SERVICES CORPORATION’S MOTION TO INTERVENE**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW LCRA Transmission Services Corporation (LCRA TSC) pursuant to the Public Utility Regulatory Act<sup>1</sup> (PURA) and 16 Tex. Admin. Code §§ 22.102, 22.103(b), and 22.104 (TAC) and files this Motion to Intervene, respectfully showing as follows:

**I. BACKGROUND**

On November 7, 2018, Oncor Electric Delivery Company LLC (Oncor) and AEP Texas Inc. (AEP Texas) (Oncor and AEP Texas are collectively the “Applicants”) filed their joint application in this docket for an amendment to their certificates of convenience and necessity (CCN) to construct the proposed Sand Lake to Solstice double-circuit 345-kV transmission line project in Pecos, Reeves, and Ward Counties (Sand Lake to Solstice Project). On the same day, AEP Texas and LCRA TSC filed a joint application for an amendment to their CCN’s for the proposed Bakersfield to Solstice 345-kV transmission line project in Pecos County (Bakersfield to Solstice Project) (collectively the “Projects”). The Projects are part of a larger group of projects known collectively as the “Far West Texas Project.” Also on November 7, 2018, AEP Texas, Oncor, and LCRA TSC filed a joint motion to consolidate their respective dockets because the Projects share a common point of interconnection at the existing AEP Texas Solstice Switch Station.

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<sup>1</sup> Public Utility Regulatory Act, TEX. UTIL. CODE ANN. §§ 11.001-58.302 (West 2016 & Supp. 2017), §§ 59.001-66.016 (West 2007 & Supp. 2017).

## **II. STANDING TO INTERVENE**

As a transmission service provider within the Electric Reliability Council of Texas (ERCOT) and an applicant in a joint proceeding to the larger Far West Texas Project, LCRA TSC is directly impacted by the Sand Lake to Solstice Project. Specifically, LCRA TSC is a joint applicant with AEP Texas to construct the Bakersfield to Solstice Project, a component of the Far West Texas Project, which will interconnect to the Sand Lake to Solstice Project at the AEP Texas Solstice Switch Station. Because the Sand Lake to Solstice Project and the Bakersfield to Solstice Project are each a necessary component of the larger Far West Texas Project, LCRA TSC may be adversely impacted by the outcome in this proceeding.

Thus, LCRA TSC has one or more justiciable interests that may be adversely affected by the outcome of this proceeding and therefore has standing to intervene under 16 TAC § 22.103.

## **III. AUTHORIZED REPRESENTATIVE**

LCRA TSC hereby designates the following individual as its authorized representative for purposes of this proceeding and requests that all pleadings, notices, correspondence, or other documents be served upon its representative:

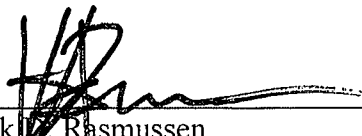
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## **IV. PRAYER**

LCRA TSC respectfully requests that its motion to intervene be granted, and that it receive such other and further relief to which it may show itself justly entitled.

Respectfully submitted,

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**ATTORNEYS FOR LCRA TRANSMISSION  
SERVICES CORPORATION**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record on this date, November 7, 2018, in accordance with P.U.C. Procedural Rule 22.74.

  
Kirk D. Rasmussen